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Acting Under Authority Conferred By 28 U.S.C. § 515

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA,)	Case No. 18-CR-00258 EJD
)	
Plaintiff,)	DECLARATION OF VANESSA BAEHR-JONES
)	IN SUPPORT OF UNITED STATES' OPPOSITION
v.)	TO DEFENDANT ELIZABETH HOLMES'S
)	MOTION TO EXCLUDE EXPERT TESTIMONY
ELIZABETH HOLMES and RAMESH)	OR, IN THE ALTERNATIVE, COMPEL
"SUNNY" BALWANI,)	ADEQUATE RULE 16 DISCLOSURE
)	
Defendants.)	

I, Vanessa Baehr-Jones, declare:

1. I am an Assistant United States Attorney (AUSA) representing the United States of America, the plaintiff in this case.

2. Attached hereto as Exhibit 1 is a true and correct copy of a Memorandum of Interview (MOI) of Dr. Steve Linnerson.

3. Attached hereto as Exhibit 2 is a true and correct copy of an MOI of Dr. Audra Zachman.

DECL. OF VANESSA BAEHR-JONES
18-CR-00258 EJD

1 4. Attached hereto as Exhibit 3 is a true and correct copy of an MOI of Dr. Edward Szmuc.

2 5. Attached hereto as Exhibit 4 is a true and correct copy of an MOI of Dr. John Couvaras.

3 6. Attached hereto as Exhibit 5 is a true and correct copy of emails sent and received by
4 Defendant Elizabeth Holmes on September 29, 2014.

5 7. Attached hereto as Exhibit 6 is a true and correct copy of an MOI of Ms. JoEllen Embry.

6 8. Attached hereto as Exhibit 7 is a true and correct copy of a Federal Bureau of
7 Investigation 302 Report of Dr. Gerald Asin.

8 9. Attached hereto as Exhibit 8 is a true and correct copy of a Federal Bureau of
9 Investigation 302 Report of patient E.T.

10 10. Attached hereto as Exhibit 9 is a true and correct copy of Defendant Ramesh Balwani's
11 Petition to Appeal before the Ninth Circuit Court of Appeals in Case No. 20-80057.

12 11. Attached hereto as Exhibit 10 is a true and correct copy of a Federal Bureau of
13 Investigation 302 Report of Dr. Curtis Page.

14 12. I declare under penalty of perjury under the laws of the United States of America that the
15 foregoing is true and correct and that this declaration is executed at Oakland, California, on July 10,
16 2020.

17 DATED: July 10, 2020

/s/

18 VANESSA BAEHR-JONES
19 Assistant United States Attorney
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